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**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
AND
INDIANAPOLIS ENVIRONMENTAL RESOURCES
MANAGEMENT DIVISION**

**Vista Packaging Corporation
7915 East 30th Street
Indianapolis, Indiana 46219**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Minor Source Operation Permit No.:097-11648-00369	
Issued by: Robert F. Holm, Ph.D. ERMD Administrator	Issuance Date: March 13, 2000

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Indianapolis Environmental Resources Management Division. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary paper coating and packaging materials manufacturing facility.

Authorized Individual: Carl Rolfsen
Source Address: 7915 East 30th Street, Indianapolis, Indiana 46219
Mailing Address: 7915 East 30th Street, Indianapolis, Indiana 46219
Phone Number: (317) 898-2000
SIC Code: 2670
County Location: Marion
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Two (2) Sakurai Maestro SC101A coating operations, identified as EU#1 and EU#2, exhausting to stack, 001and 002;
- (b) One (1) Harris Coater coating operation, identified as EU#3, exhausting to stack 003; and
- (c) The following insignificant support operations: a coating storage area, a screen preparation and cleaning area, laminating and foil stamping operations, gluing and folding operations, and a die cutting perforating embossing operation, exhausting to stack 004.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Environmental Resources Management Division (ERMD), Air Quality and the Office of Air Management (OAM), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to ERMD and IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the ERMD Administrator prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the ERMD Administrator, the Permittee shall attach it to this document.

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, and ERMD, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of volatile organic compounds is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM, and ERMD prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAM, and ERMD prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. IDEM, OAM, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM and ERMD within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, and ERMD, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, and ERMD shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and ERMD, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity) monitor in a six (6) hour period.

Testing Requirements

C.8 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM and ERMD.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, and ERMD, if the source submits to IDEM, OAM, and ERMD a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, and ERMD using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

424 C.12 Annual Emission Statement [326 IAC 2-6]

- 425 (a) The Permittee shall submit an annual emission statement certified pursuant to the
426 requirements of 326 IAC 2-6, that must be received by April 15 of each year and must
427 comply with the minimum requirements specified in 326 IAC 2-6-4. The annual
428 emission statement shall meet the following requirements:
429
- 430 (1) Indicate actual emissions of criteria pollutants from the source, in compliance
431 with 326 IAC 2-6 (Emission Reporting);
432
- 433 (2) Indicate actual emissions of other regulated pollutants from the source, for
434 purposes of Part 70 fee assessment.
435
- 436 (b) The annual emission statement covers the twelve (12) consecutive month time period
437 starting December 1 and ending November 30. The annual emission statement must be
438 submitted to:
439
- 440 Indiana Department of Environmental Management
441 Technical Support and Modeling Section, Office of Air Management
442 100 North Senate Avenue, P. O. Box 6015
443 Indianapolis, Indiana 46206-6015
444
- 445 and
446
- 447 Environmental Resources Management Division
448 Air Quality Management Section, Data Compliance
449 2700 South Belmont Avenue
450 Indianapolis, Indiana 46221
451
- 452 (c) The annual emission statement required by this permit shall be considered timely if the
453 date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the
454 private shipping receipt, is on or before the date it is due. If the document is submitted by
455 any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on
456 or before the date it is due.
457

458 The submittal by the Permittee does require the certification by the "authorized individual" as
459 defined by 326 IAC 2-1.1-1.
460

461 C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- 462 (a) With the exception of performance tests conducted in accordance with Section C
463 Performance Testing, all observations, sampling, maintenance procedures, and record
464 keeping, required as a condition of this permit shall be performed at all times the
465 equipment is operating at normal representative conditions.
466
- 467 (b) As an alternative to the observations, sampling, maintenance procedures, and record
468 keeping of subsection (a) above, when the equipment listed in Section D of this permit is
469 not operating, the Permittee shall either record the fact that the equipment is shut down
470 or perform the observations, sampling, maintenance procedures, and record keeping
471 that would otherwise be required by this permit.
472
- 473 (c) If the equipment is operating but abnormal conditions prevail, additional observations
474 and sampling should be taken with a record made of the nature of the abnormality.
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477
- 478 (d) If for reasons beyond its control, the operator fails to make required observations,
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sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response

steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management and ERMD stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

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- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
 - (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221
 - (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

The stationary paper coating and packaging materials manufacturing facility consists of the following: Two (2) Sakurai 101 Maestro A and 102 Maestro B screen coaters exhausting to stacks #001 and #002 respectively; one (1) 108 Harris coater exhausting to stack #003; and the following insignificant support operations: a coating storage area, a screen preparation and cleaning area, laminating and foil stamping operations, gluing and folding operations, and a die cutting perforating embossing operation, exhausting to stack 004.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8]

That pursuant to 326 IAC 2-5.1-3(e)(1), records of surface coating quantities and organic solvent contents shall be maintained for a minimum period of 36 months and made available upon request of the ERMD and IDEM, OAM. Any change or modification which may increase potential emissions from any individual emission unit identified in Section D.1 to 25 tons per year from the equipment covered in this permit shall obtain a significant permit revision before such change may occur.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

MINOR SOURCE OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Vista Packaging Corporation
Source Address: 7915 East 30th Street, Indpls., IN 46219
Mailing Address: 7915 East 30th Street, Indpls., IN 46219
CP No.: 097-11648-00369

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under
326 IAC 2-6.1-5(a)(5).

Company Name:	Vista Packaging Corporation
Address:	7915 East 30th Street
City:	Indianapolis, Indiana
Phone #:	(317) 898-2000
MSOP #:	097-11648-00369

I hereby certify that Vista Packaging Corporation is **9** still in operation.
9 no longer in operation.

I hereby certify that Vista Packaging Corporation is **9** in compliance with the requirements of MSOP 097-
11648-00369.

9 not in compliance with the requirements of MSOP 097-11648-00369.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative
description of how the source did or will achieve compliance and the date compliance was, or will be
achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT FAX NUMBER - 317 233-5967

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. (_____) _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____

INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

—

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: _____

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Indianapolis Environmental Resources Management Division
Air Quality Management Section**

and

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for New Construction and
Minor Source Operation**

Source Background and Description

Source Name:	Vista Packaging Corporation
Source Location:	7915 East 30 th Street, Indianapolis, Indiana 46219
County:	Marion
MSOP No.:	097-11648-00369
SIC Code:	2670
Permit Reviewer:	TMH

The Environmental Resources Management Division (ERMD) has reviewed an application from Vista Packaging Corporation relating to the construction and operation of a screen coating operation:

- (a) Two (2) Sakurai Maestro SC101A coating operations, identified as EU#1 and EU#2, exhausting to stack, 001 and 002;
- (b) One (1) Harris Coater coating operation, identified as EU#3, exhausting to stack 003; and
- (c) The following insignificant support operations: a coating storage area, a screen preparation and cleaning area, laminating and foil stamping operations, gluing and folding operations, and a die cutting perforating embossing operation, exhausting to stack 004.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
001	Screen Coater	25	0.833	750 est.	Ambient
002	Screen Coater	25	0.833	750 est.	Ambient
003	Blanket Coater	25	1.333	750 est.	Ambient
004	General Building	20	NA	ND	Ambient

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 19, 1999.

Emissions Calculations

See TSD Appendix A for detailed calculations.

Total Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential Emissions (tons/year)
Particulate Matter (PM)	0.0
Particulate Matter (PM10)	0.0
Sulfur Dioxide (SO ₂)	0.0
Volatile Organic Compounds (VOC)	35.8
Carbon Monoxide (CO)	0.0
Nitrogen Oxides (NO _x)	0.0
Single Hazardous Air Pollutant (HAP)	
Vinyl Acetate	0.28
Toluene	7.8
DI-2-Ethylhexyl Phthalate	3.4
Triethylamine	0.8
Methyl Alcohol	4.5
Dibutyl Phthalate	3.4
Combination of HAPs	20.2

- (a) Potential emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-5.1-4, a minor source operating permit will be issued.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO_x and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
Particulate Matter (PM)	0.0
Particulate Matter (PM ₁₀)	0.0
Sulfur Dioxide (SO ₂)	0.0
Volatile Organic Compounds (VOC)	35.8
Carbon Monoxide (CO)	0.0
Nitrogen Oxides (NO _x)	0.0
Single Hazardous Air Pollutant (HAP)	
Vinyl Acetate	0.28
Toluene	7.8
DI-2-Ethylhexyl Phthalate	3.4

Triethylamine	0.8
Methyl Alcohol	4.5
Dibutyl Phthalate	3.4
Combination of HAPs	20.2

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- 1. The printing operation is not subject to the New Source Performance Standards for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60.430, Subpart QQ (326 IAC 12), because it is not a publication Rotogravure printing operation.
- 2. There are no New Source Performance Standards (326 IAC 12) applicable to this facility.
- 3. The printing operation is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR Part 63.820, Subpart KK (326 IAC 12), because it is not a major source for HAPs.
- 4. There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Source

- 1. IAPCB Regulation 2 (Permits) and 326 IAC 2-6 (Emission Reporting)

This facility is subject to IAPCB Regulation 2 (Permits) and 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

2. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State and Local Rule Applicability - Individual Facilities

1. IAPCB Regulation 2 (Permits) and 326 IAC 8-1-6 (General Provisions relating to VOC rules: general reduction requirements for new facilities)

The individual screen coating operations are not subject to the requirements of 326 IAC 8-1-6 due to the potential volatile organic compound emissions being less than twenty-five (25) tons per year each.
2. The screen coating operation is not subject to the requirements of 326 IAC 8-5-5 (Miscellaneous operations: graphic arts operations) due to it not being a graphic arts facility.
3. The screen coating operation is not subject to the requirements of 326 IAC 2-4 due to this source not being a major source of hazardous air pollutants.

Conclusion

The construction of this screen coating operation will be subject to the conditions of the attached proposed **MSOP No. 097-11648-00369**.

EMISSION CALCULATIONS

Sakurai Maestro SC102A and SC102B

Max. Coating Use = 236,792 lb/yr

Worst case VOC = 1.30%

$$\begin{aligned} &= (236,792 \text{ lb/yr})(1.30\%)(1 \text{ ton}/2000 \text{ lb})(2 \text{ presses}) \\ &= 3.1 \text{ ton/yr} \end{aligned}$$

Clean-up Solvent

Max. Solvent Use = 14,624 lb/yr

Worst case VOC = 99%

$$\begin{aligned} &= (14,624 \text{ lb/yr})(99\%)(1 \text{ ton}/2000 \text{ lb})(2 \text{ presses}) \\ &= 14.4 \text{ ton/yr} \end{aligned}$$

Harris Coater

Maximum Adhesive Use = 254,161 lb/yr

Worst Case VOC = 2.4%

$$\begin{aligned} &= (254,161 \text{ lb/yr})(2.4\%)(1 \text{ ton}/2000 \text{ lb}) \\ &= 3.0 \text{ ton/yr} \end{aligned}$$

Clean-up Solvent

Max. Solvent Use = 30,581 lb/yr

Worst case VOC = 99.9%

$$\begin{aligned} &= (30,581 \text{ lb/yr})(99.9\%)(1 \text{ ton}/2000 \text{ lb}) \\ &= 15.3 \text{ ton/yr} \end{aligned}$$

TOTAL VOC EMISSIONS = 35.8 ton/yr

HAP EMISSIONS

Vinyl acetate

Latiseal

Max. usage = 127,080 lb/yr

% HAP = 0.1

$$=(127,080 \text{ lb/yr})(0.1\%)(1 \text{ ton}/2000 \text{ lb})$$

$$=0.06 \text{ ton/yr}$$

Resin Adhesive

Max. usage = 49,575 lb/yr

% HAP = 0.9

$$=(49,575 \text{ lb/yr})(0.9)(1 \text{ ton}/2000 \text{ lb})$$

$$=0.22 \text{ ton/yr}$$

Toluene

Rycolite

Max. usage = 59,828 lb/yr

%HAP = 25%

$$=(59,828 \text{ lb/yr})(25\%)(1 \text{ ton}/2000 \text{ lb})$$

$$=7.5 \text{ ton/yr}$$

Latiseal

Max. usage = 127,080 lb/yr

% HAP = 0.5

$$=(127,080 \text{ lb/yr})(0.5\%)(1 \text{ ton}/2000 \text{ lb})$$

$$=0.32 \text{ ton/yr}$$

DI-2-Ethylhexyl Phthalate

J9941E

Max. usage = 681,535 lb/yr

% HAP = 1.0

$$=(681,535 \text{ lb/yr})(1.0\%)(1 \text{ ton}/2000 \text{ lb})$$

$$=3.4 \text{ ton/yr}$$

Triethylamine

Latiseal

Max. usage = 127,080 lb/yr

% HAP = 1.3

$$=(127,080 \text{ lb/yr})(1.3\%)(1 \text{ ton}/2000 \text{ lb})$$

$$=0.8 \text{ ton/yr}$$

Methyl Alcohol

Rycolite

Max. usage = 59,828 lb/yr

%HAP = 15%

$$=(59,828 \text{ lb/yr})(15\%)(1 \text{ ton}/2000 \text{ lb})$$

$$=4.5 \text{ ton/yr}$$

Dibutyl Phthalate

J9941E

Max. usage = 681,535 lb/yr

%HAP = 1%

$$=(681,535 \text{ lb/yr})(1\%)(1 \text{ ton}/2000 \text{ lb})$$

$$=3.4 \text{ ton/yr}$$

Combined HAPs = 20.2